

Paul R. Hejmanowski, Esq. (NSB #94)
Charles H. McCrea, Esq. (NSB #104)
PRHLAW LLC
520 South Fourth Street, Suite 360
Las Vegas, Nevada 89101
T: (702) 834-6166
paul@prhlawllc.com
charles@prhlawllc.com

Amy B. Boyea (admitted *pro hac vice*)
Emily K. Felix (admitted *pro hac vice*)
Kade A. Rhodes (admitted *pro hac vice*)
MCDOWELL HETHERINGTON LLP
1000 Ballpark Way, Suite 209
Arlington, TX 76011
Telephone: (817) 635-7300
Facsimile: (817) 635-7308
E-mail: Amy.Boyea@mhllp.com
E-mail: Emily.Felix@mhllp.com
E-mail: Kade.Rhodes@mhllp.com

Attorneys for Defendant
AAA LIFE INSURANCE COMPANY

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BIANCA LANG-BLACK, an individual,

Plaintiff,

vs.

AAA LIFE INSURANCE COMPANY; a foreign
corporation; and DOES I through V, and ROE
CORPORATIONS I through V, inclusive,

Defendant.

CASE NO.: 2:23-cv-00117-GMN-DJA

**STIPULATION AND PROPOSED
ORDER TO CONTINUE TRIAL**

THE PARTIES HEREBY STIPULATE AND AGREE to continue the currently set jury trial on the stacked calendar on August 25, 2025 to the month of November 2025 to permit the Parties to attend private mediation. The Parties further request that the calendar call currently set for August 19, 2025 at 9:00 a.m. be reset for a date and time aligning with the new trial date. The Parties hereby stipulate and agree as follows:

1. On October 25, 2022, Plaintiff Bianca Lang-Black filed a complaint against Defendant AAA Life Insurance Company in the District Court of Clark County, Nevada

1 asserting breach of contract and extra-contractual claims related to life insurance policy number
2 4034586182 insuring the life of James A. Black. On January 23, 2023, AAA Life removed the
3 case to this Court. ECF No. 1.

4 2. On February 19, 2024, AAA Life filed a Motion for Summary Judgment against
5 each of Plaintiff's claims. ECF No. 73. While the motion was pending, the Parties attended a
6 settlement conference on May 1, 2024 before the Honorable Daniel J. Albregts. The Parties
7 were unable to reach a settlement. On August 16, 2024, the Court granted in part and denied in
8 part AAA Life's Motion for Summary Judgment. Specifically, the Court granted summary
9 judgment for AAA Life on Plaintiff's bad faith and NRS 686A.310 claims, as well as Plaintiff's
10 request for punitive damages, and denied summary judgment on Plaintiff's breach of contract
11 and declaratory judgment claims. ECF No. 86.

12 3. On November 12, 2024, the Court entered a Pretrial Order setting jury trial on the
13 stacked calendar on August 25, 2025. ECF No. 94. There have been no prior continuances of
14 the trial date.

15 4. The Parties have conferred and agreed to attend private mediation in an attempt
16 to reach an agreement on Plaintiff's remaining claims. To allow the Parties to attend mediation
17 before incurring additional fees associated with trial, the Parties have agreed and stipulated to
18 continue trial to the week of November 3, 10 or 17, 2025, based upon the Court's November
19 trial stacks.

20 5. Good cause exists to continue the trial date in that the Parties, in the interests of
21 justice and judicial economy, have a desire to continue settlement discussions in earnest. The
22 Parties are currently scheduled for a private mediation on August 5, 2025 with Justice Abbi
23 Silver (Ret.). The Parties agree that a continuance will provide a better opportunity to engage
24 in mediation and settlement discussions without unnecessary expenditure of judicial and legal
25 resources, in furtherance of the parties' goal of resolution without the necessity of trial.

26 6. Additionally, Plaintiff's counsel is scheduled for trial in the Eighth Judicial
27 District Court, Case No. A-22-862744-C, from August 4 through August 15, 2025, which will
28

1 significantly impede counsel's ability to adequately prepare for the current trial date before this
2 Court.

3 7. Neither the Plaintiff nor AAA Life will be prejudiced by this continuance, but
4 will both likely benefit therefrom by allowing the Parties to attend mediation in an attempt to
5 resolve the matter without the need to expend the time and money necessary for a trial.

6 The Parties stipulate to the foregoing, and through their counsel, respectfully submit that
7 good cause exists for the requested continuance.

8 **IT IS SO STIPULATED.**

9 DATED: July 14, 2025

By: /s/ Amy B. Boyea

10 Paul R. Hejmanowski, Esq. (NSB #94)
11 Charles H. McCrea, Esq. (NSB #104)
12 PRHLAW LLC
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15 T: (702) 834-6166
16 paul@prhlawllc.com
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21 McDOWELL HETHERINGTON LLP
22 1000 Ballpark Way, Suite 209
23 Arlington, TX 76011
24 Telephone: (817) 635-7300
25 Facsimile: (817) 635-7308
26 E-mail: Amy.Boyea@mhlhp.com
27 E-mail: Emily.Felix@mhlhp.com
28 E-mail: Kade.Rhodes@mhlhp.com

*Attorneys for Defendant
AAA Life Insurance Company*

By: /s/ Justin A. Corne /s/

JUSTIN A. CORNE, ESQ.
Nevada Bar No. 14504
OHLSON CORNE LLP
10100 W. Charleston Blvd., Suite 110
Las Vegas, NV 89135
(702) 982-0055 Phone
(702) 982-0150 Fax
EFILE@INJURED.VEGAS
JUSTIN@INJURED.VEGAS

Attorneys for Plaintiff

ORDER

This case is set for ~~court~~ jury trial on the ~~fixed~~ stacked calendar on
November 3, 2025, at 8:30 a.m.. Calendar call will be held on October 28, 2025, at 9:00 am

IT IS SO ORDERED.

DATED: July 14, 2025.


UNITED STATES DISTRICT JUDGE